

# EXHIBIT E

**From:** Justin A. Zimmerman <[JZimmerman@laverylaw.com](mailto:JZimmerman@laverylaw.com)>  
**Sent:** Tuesday, August 6, 2024 11:28 AM  
**To:** Timothy McNair <[tmcnair@mcnairlaw.com](mailto:tmcnair@mcnairlaw.com)>  
**Cc:** Ashley Rutter <[ashley@mcnairlaw.com](mailto:ashley@mcnairlaw.com)>  
**Subject:** RE: Spencer v. McSparren, et al.

Good morning Attorney McNair,

Thank you for your response; it has been difficult to get one. As we discussed yesterday, this was the first time you indicated you had any issues with the discovery responses provided on April 29, 2024. Those responses were referenced in subsequent communications regarding Plaintiff's discovery responses. We are willing to be reasonable and discuss specific issues with Defendants' responses, but we are also looking for a definite timeframe for Plaintiff to respond. Therefore, we propose that the discovery deadline be extended to October 9, 2024, with Plaintiff's responses due by September 9, 2024, and Plaintiff to appear for deposition by September 23, 2024. If during that time period you still feel it is necessary to file a discovery motion, then so be it.

Additionally, please let us know if you have any trouble accessing the documents.

Regards,

**Justin A. Zimmerman, Esquire**  
**Lavery Law**  
225 Market Street, Suite 304  
Harrisburg, PA 17101-2126  
Phone: 717.233.6633  
Fax: 717.233.7003  
Email: [jzimmerman@laverylaw.com](mailto:jzimmerman@laverylaw.com)  
Web: [www.laverylaw.com](http://www.laverylaw.com)

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**From:** Timothy McNair <[tmcnair@mcnairlaw.com](mailto:tmcnair@mcnairlaw.com)>  
**Sent:** Monday, August 5, 2024 4:57 PM  
**To:** Justin A. Zimmerman <[JZimmerman@laverylaw.com](mailto:JZimmerman@laverylaw.com)>  
**Cc:** Ashley Rutter <[ashley@mcnairlaw.com](mailto:ashley@mcnairlaw.com)>  
**Subject:** RE: Spencer v. McSparren, et al.

In looking at Dori's email, I see there is a link to documents in Sharefile. I tried to access it and the link is expired or otherwise invalid. I have not seen any of the documents, nor do I have the downloaded.